

JULIA M. JAYNE (State Bar No. 202753)
ASHLEY RISER (State Bar No. 320538)
E-Mail: julia@jaynelawgroup.com
JAYNE LAW GROUP, P.C.
483 9TH St, Suite 200
Oakland, CA 94607
Telephone: (415) 623-3600
Facsimile: (415) 623-3605

Attorneys for Defendant
EFRAIN REYES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EFRAIN REYES et al,

Defendant.

Case No. CR 18-417 CRB [JCS]

**EFRAIN REYES' MODIFIED *EX PARTE*
APPLICATION FOR ORDER
PERMITTING TRAVEL OUT OF
DISTRICT; [Proposed] Order**

I, Ashley Riser, declare:

1. I represent Defendant Efrain Reyes in the above-entitled matter. He is currently released on an unsecured \$50,000 bond with travel restricted to the Northern District of California. The purpose of this application is to request that Mr. Reyes be allowed to drive to Las Vegas, Nevada from January 8 - 18, 2020 for a work event. Mr. Reyes intends to drive to and from Las Vegas, Nevada with his employer.
2. On June 25, 2019, Mr. Reyes pled guilty to a single count of Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine. The Honorable Charles R. Breyer has set Mr. Reyes' sentencing for June 3, 2020 at 1:30 PM.
3. I have contacted AUSA Ross Weingarten, who informed me that he has no objection to Mr. Reyes' request.
4. Pretrial Services Officer Josh Libby, who monitors Mr. Reyes, has informed me that he has

no objection to this request.

5. Based on the foregoing, I respectfully request that the conditions of Mr. Reyes' release be modified so that he may be permitted to travel to Las Vegas, Nevada, California from January 8 - 18, 2020. All other conditions of Mr. Reyes' release shall remain the same. Furthermore, Mr. Reyes shall inform his pretrial services officer of all travel-related details.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: January 7, 2020

/s/
ASHLEY RISER
Attorney for EFRAIN REYES

[PROPOSED] ORDER

Based on the foregoing, and good cause appearing:

IT IS HEREBY ORDERED that the conditions of Defendant Efrain Reyes' release shall be modified as follows:

Mr. Reyes is permitted to travel to Las Vegas, Nevada, California from January 8 - 18, 2020. All other terms and conditions shall remain in place.

DATED: _____

HONORABLE MAG. JUDGE JOSEPH C. SPERO
United States Magistrate Court Judge

LAW OFFICES
JAYNE LAW GROUP, P.C.
483 9TH ST., SUITE 200
OAKLAND, CALIFORNIA 94607